

September 29, 2008

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Delta Vision Blue Ribbon Task Force
State of California

**Subject: Comments on the Fourth Draft
 Delta Vision Strategic Plan**

From: Brannan-Andrus Levee Maintenance District
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A principal component of the **Strategic Plan**, that gives rise to major concerns within the Delta community, as well as local maintaining agencies that have a stake in the future direction taken, is the proposal to create a new regional governance structure with broad powers and authorities. The Brannan-Andrus levee maintenance District (BALMD) strongly disagrees with the direction taken in this Plan, that is built on the premise that the local priority system for levee maintenance and upgrades, that is largely based on fulfilling a responsibility to provide the best possible level of protection for lives, property, businesses, crops, and infrastructure within available resources, needs to be trumped by a politically contrived priority system that primarily focuses on State interests, especially ecosystem vitality, water quality and conveyance and public use. BALMD also disagrees with the elements of the Plan that also stress the need for new policies that consider beneficiaries' ability and willingness to pay for protection, that assign importance values to private uses and weigh the benefits against the cost of levee improvements, and that establish minimum design types and standards based on a classification system generated by the CDEW Plan, which is to be built around the co-equal goals of ecosystem and a reliable water supply. Obviously, this approach is in conflict with current District practices and historical precedence and would add additional uncertainty to an annual budgeting process that is almost a joke.

It appears to BALMD that, the thrust of the Strategic Plan strategies for protecting the integrity of the Delta system is to abandon the inter-related system approach that has worked well for the last 35 years, under local management, and instead institute a classification system based on perceptions emanating from a public relations contrived

notion that the Delta is not sustainable in its current configuration. Using the absolute worst case natural disaster scenario as a bench mark, coupled with a failure to live up to promises made 35 years ago about State financial support to share the cost of Delta levee maintenance, State policymakers appear prepared to drastically alter an equitable program that worked in favor of a tiered ranking system that will favor some islands over others and vest control over local priorities in a regional authority. This appears inconsistent with the stated goal of protecting the California Delta as a unique and valued place. The Delta's uniqueness is attributable to the local values espoused by its citizenry and reflected in the decisions and actions of its local government agencies, such as Brannan-Andrus Levee Maintenance District.

The biggest affront to local levee maintaining agencies, like BALMD, is the overarching policy and principles outlined in Strategy 6.1, that throw one of the few successful government efforts, the Levee Subventions Program, under the bus. Why should a cost effective, on the ground, locally controlled program, responsible to all Delta uses, be relegated to obscurity and supplanted with a process and authority whose only priority is state interests in ecosystem, water quality and supply, navigation and recreation? It is difficult to visualize how such an approach would benefit the Delta as a whole and protect it **as a place**. The District contends that Strategy 6.1 contradicts the Plan assertion that the Delta is treated as *the third leg of the stool*, along with the co-equal goals.